

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>FRANCES JOYCE</b>	:
	:
	:
<b>Plaintiff,</b>	:
	:
<b>v.</b>	:
	:
	:
<b>RICHARD DEVASTEY, ET AL</b>	:
	<b>NO. 12-CV-834</b>
	:
<b>Defendant.</b>	

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**REPLY ON BEHALF OF DEFENDANT, RICHARD DEVASTEY TO  
AMENDED CROSSCLAIM OF ADDITIONAL DEFENDANT, MANGO  
& AUGUST, INC. (INCORRECTLY IDENTIFIED AS BARNARD AUGUST)**

**REPLY TO NEW MATTER**

1-27. Denied. The allegations contained in these paragraphs contain conclusions of law to which no response is required. To the extent same are deemed factual in nature, they are specifically denied and strict proof is demanded at trial, if relevant. By way of further answer, Defendant incorporates his Answer to Plaintiff's Complaint with New Matter and the Joinder Complaint as if fully set forth herein at length.

WHEREFORE, Answering Defendant, Richard Devasety, demands judgment in his favor and against all other parties, together with costs, attorney's fees and other such relief as this Court deems just and appropriate.

**REPLY TO CROSS CLAIM**

28. Defendant incorporates his Answer to Plaintiff's Complaint with New Matter and the Joinder Complaint as if fully set forth herein at length.

29. Denied. The allegations contained in this paragraph contain conclusions of law to which no response is required. To the extent same are deemed factual in nature, they are specifically denied and strict proof is demanded at trial, if relevant

WHEREFORE, Answering Defendant, Richard Devasety, demands judgment in his favor and against all other parties, together with costs, attorney's fees and other such relief as this Court deems just and appropriate.

LAW OFFICES OF JAMES L. BARLOW

By:   
SUSAN J. WIENER, ESQUIRE  
Attorney for Defendant,  
Richard Devasety

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Reply to New Matter Crossclaim was served electronically, this 26 day of February, 2013 upon the following counsel of record:

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ATTORNEY FOR DEFENDANT,  
PROGRESS BANK OF FLORIDA,  
C/O FDIC AS RECEIVER

and on all other counsel of record and unrepresented parties on the attached list by United States  
Mail, First Class postage prepaid.

Dated: February 16, 2013

  
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SUSAN J. WIENER, ESQUIRE